

### Remarks

In the office action mailed July 30, 2004, the Examiner rejected claims 1-8, 10 and 12 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,622,018 to Erekson (hereinafter Erekson), claims 9 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Erekson in view of U.S. Patent No. 6,640,253 to Schaefer (hereinafter Schaefer), claims 13-15, 17 and 19-20 as being unpatentable over Erekson in view of U.S. Application No. 2002/0098840 to Hanson, et al. (hereinafter Hanson), and claims 16 and 18 19-20 as being unpatentable over Erekson in view of Hanson and further in view of Schaefer.

By this paper, Applicant's representative amends independent claims 1, 10, 14 and 17. Support for the amendment to the claims can be found, for example, on Figs. 1 and 2, and in the specification on page 4, ll. 11-18. As such, no new matter has been added.

With respect to the Examiner's rejections, the Examiner is invited to consider the following remarks.

Regarding the rejections of independent claims 1, 10, 14 and 17 under 35 U.S.C. §§ 102 and 103, the cited references, alone or in combination, fail to prove all of the features of the amended independent claims. In particular, the presently pending independent claims are directed to synchronizing managed data where the managed data represents groups of documents that have been identified as part of a collaboration cell, and the documents are stored in independent or related files that are shared with a group of people working on a particular task or project.

Erekson is directed to a system and method for controlling a remote device over a wireless connection. In one embodiment, a hand-held computer system having a Bluetooth-enabled transceiver is used to control other Bluetooth-enabled devices. A wireless connection between a transceiver and a remote device is established. A position where a stylus makes contact with a surface of an input device of the hand-held computer system is registered. The particular position where the stylus element makes contact with the input device is

translated into a particular command for controlling the remote device. The command is then transmitted to the remote device over the wireless connection. (Erekson, Abstract).

Schaefer is directed to dynamic logical control of network units in ad-hoc communications networks. (Schaefer, Title). In particular, Schaefer concerns a logical function is that executed in addressable units in a wireless local area network based upon the current state value of other units in the network. Depending upon a persistence setting which may be pre-set or programmed into each unit, the logical function may be recomputed at predetermined time intervals, or upon receiving an overriding resetting signal or control packet. (Schaefer, Abstract).

Hanson is directed to a method and apparatus for providing mobile and other intermittent connectivity in a computing environment. (Hanson, Title). In particular, Hanson concerns a seamless solution that transparently addresses the characteristics of nomadic systems, and enables existing network applications to run reliably in mobile environments. A Mobility Management Server coupled to the mobile network maintains the state of each of any number of Mobile End Systems and handles the complex session management required to maintain persistent connections to the network and to other peer processes. If a Mobile End System becomes unreachable, suspends, or changes network address (e.g., due to roaming from one network interconnect to another), the Mobility Management Server maintains the connection to the associated peer task--allowing the Mobile End System to maintain a continuous connection even though it may temporarily lose contact with its network medium. An interface-based listener uses network point of attachment information supplied by a network interface to determine roaming conditions and to efficiently reestablish connection upon roaming. The Mobility Management Server can distribute lists to Mobile End Systems specifying how to contact it over disjoint networks. (Hanson, Abstract).

Nowhere do the cited references, alone or in combination, disclose, suggest or discuss synchronizing managed data where the managed data represents groups of documents that have been identified as part of a collaboration cell, and the documents are stored in

independent or related files that are shared with a group of people working on a particular task or project. As such, *prima facie* cases of anticipation and obviousness are not established for pending claims 1-20 and the rejections should be withdrawn.

Regarding claims which depend from the independent claims, Applicant contends that these claims are patentable for at least the same reasons that the independent claims are patentable. Moreover, Applicant contends that these claims recite further limitations, in addition to the limitations of the independent claims, which render these claims additionally patentable.

Consequently, in view of the above and in the absence of better art, Applicant's Attorney respectfully submits the application is in condition for allowance which allowance is respectfully requested. No fee is believed to be due for the filing of this paper. Please charge any additional fees or credit any overpayments as a result of the filing of this paper to our Deposit Account No. 02-3978 -- a duplicate of this paper is enclosed for that purpose.

The Examiner is requested to telephone the undersigned to discuss prompt resolution of any remaining issues necessary to place this case in condition for allowance.

Respectfully submitted,  
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